

1 1 Jeremy R. Alberts, Esq.
2 2 Nevada Bar No. 10797
3 3 jalberts@wwhgd.com
4 4 Christopher T. Byrd, Esq.
5 5 Nevada Bar No. 6582
6 6 cbyrd@wwhgd.com
7 7 WEINBERG, WHEELER, HEDGINS,
8 8 GUNN & DIAL, LLC
9 9 6385 South Rainbow Blvd., Suite 400
10 10 Las Vegas, Nevada 89118
11 11 Telephone: (702) 938-3838
12 12 Facsimile: (702) 938-3864

8 | *Attorneys for Defendant
Universal Protection Service, LLC*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

11 NEBY YOU SOLOMON,

Plaintiff,

13 | *vs.*

14 LAS VEGAS METROPOLITAN
15 POLICE DEPARTMENT; JOSEPH
16 LOMBARDO, individually and his
17 official capacity as Sheriff; JOHN L.
18 PELLETIER, an individual; RICHARD
19 E. MAUPIN, an individual; RYAN J.
20 FRYMAN, an individual; JUAN D.
21 CONTRERAS, an individual; ALLEN
22 J. PAVESE, an individual; BRANDON
23 M. MEADS, an individual; FASHION
SHOW MALL, LLC, a Nevada limited-
liability company; UNIVERSAL
PROTECTION SERVICE, LLC, a
Nevada limited-liability company;
DOE SECURITY GUARDS I – III,
and individuals.

24 Defendants.

Case No.: 2:19-cv-00652-JAD-DJA

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
DEFENDANT UPS'S REPLY TO
PLAINTIFF'S OPPOSITION TO
DEFENDANT UNIVERSAL
PROTECTION SERVICE, LLC'S
MOTION FOR JUDGMENT ON
THE PLEADINGS (ECF NO. 39)**

(FIRST REQUEST)

25 Pursuant to LR IA 6-1, Plaintiff NEBYOU SOLOMON (“Plaintiff”) and
26 Defendant UNIVERSAL PROTECTION SERVICE, LLC (“Defendant UPS”), by
27 and through their respective counsel, hereby stipulate and request that this Court
28 extend the deadline to file Defendant UPS’s Reply to Plaintiff’s Opposition to

4
5 Defendant Universal Protection Service, LLC's Motion for Judgment on the
6 Pleadings (ECF No. 39) ("Reply"), by an additional fourteen (14) days, **extending**
7 **the Reply deadline from November 27, 2019 to December 11, 2019**. Plaintiff's
8 Opposition to Defendant Universal Protection Service, LLC's Motion for
9 Judgment on the Pleadings (ECF No. 39) ("Opposition") was filed on November
10 20, 2019. This is the first stipulation for extension of time for Defendant UPS to
11 file its Reply.

12
13 This request for an extension of time is not sought for any improper purpose
14 or other purpose of delay. This request for extension is based upon the following:
15 Counsel for Defendant UPS initiated this request due to its scheduling conflicts
16 limiting its ability to timely respond to Plaintiff's Opposition.

17
18 WHEREFORE, the parties respectfully request that this Court extend the
19 deadline to file Defendant UPS's Reply from November 27, 2019 to December 11,
20 2019.

21
22 IT IS SO STIPULATED.

23
24 Dated: November 27, 2019

25
26 MCLETCHIE LAW

27
28 /S/ Margaret A. McLetchie
Margaret A. McLetchie, Esq.
701 E. Bridger Ave., Suite 520
Las Vegas, NV 89101
Attorneys for Plaintiff

Dated: November 27, 2019

WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC

/S/ Jeremy R. Alberts
Jeremy R. Alberts, Esq.
Christopher T. Byrd, Esq.
6385 South Rainbow Blvd., Suite 400
Las Vegas, Nevada 89118
Attorneys for Defendant
Universal Protection Service, LLC

ORDER

IT IS SO ORDERED that the deadline for Defendant UPS to file its Reply to Plaintiff's Opposition to Defendant Universal Protection Service, LLC's Motion for Judgment on the Pleadings (ECF No. 39) be extended from November 27, 2019 to December 11, 2019.

Dated: December 2, 2019.


UNITED STATES DISTRICT JUDGE

Respectfully submitted by:

WEINBERG, WHEELER, HEDGINS,
GUNN & DIAL, LLC

/s/ Jeremy R. Alberts
Jeremy R. Alberts, Esq.
Christopher T. Byrd, Esq.
6385 South Rainbow Blvd., Suite 400
Las Vegas, Nevada 89118
Attorneys for Defendant
Universal Protection Service, LLC